

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re: LTL MANAGEMENT, LLC, Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan
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APPLICATION FOR ORDER SHORTENING TIME AND CERTAIN OTHER RELIEF

The applicant, the Official Committee of Talc Claimants (the “**TCC**” or the “Committee”) in the above-captioned case of LTL Management, LLC (the “Debtor” or “**LTL**”), by and through its proposed counsel, having filed substantially contemporaneously with this Application the *Motion to Seal the Redacted Portions of the Official Committee of Talc Claimants’ Objection to Debtor’s Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants* (respectively, the “**Motion to Seal**” and the “**Objection**”) filed in response to the *Debtor’s Motion for an Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants* (the “**FCR Appointment Motion**”) [Docket No. 87], hereby requests that the time period required by D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P. 9006(c)(1), and that an order be entered substantially in the form submitted herewith (the “**Scheduling Order**”), for the reasons set forth below:

1. Substantially contemporaneously with the filing of the Motion to Seal, the Committee filed a redacted version of its Objection.¹ **The return date on the Debtor’s FCR Appointment Motion is currently scheduled for May 3, 2023 at 10:00 a.m.**

¹ A redacted version of the Objection has been filed immediately prior to the filing of this Motion to Seal. An unredacted version of the Objection is being filed immediately after the filing of this Motion to Seal in accordance with this Court’s procedures for electronically requesting that a document be sealed (*see* Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey (uscourts.gov)).

2. As set forth in the Motion to Seal, the redacted portions of the Objection include certain information designated by the Debtor as being confidential (collectively, the “Confidential Information”) in accordance with that certain proposed *Agreed Protective Order Governing Confidential Information by and Between the Official Committee of Talc Claimants and the Debtor Pursuant to D.N.J. LBR 9021-1(b)* (the “**Proposed Protective Order**”²) and, to the extent applicable, that certain *Agreed Protective Order Governing Confidential Information* entered on December 21, 2021 [Dkt. No. 948] (the “**LTL 1.0 Protective Order**”) in the first LTL Chapter 11 case, Case No. 21-30589 (MBK) (“**LTL 1.0**”). So as not to delay the filing of the Committee’s Objection, the Committee is, at this time, respecting the Debtors’ confidentiality designations and does not wish to be in contempt of LTL 1.0 Protective Order, to the extent applicable. However, all of the Committee’s rights to challenge the Debtor’s designations regarding the purported Confidential Information, including, but not necessarily limited to, those rights under the terms of the Proposed Protective Order and, to the extent applicable, the LTL 1.0 Protective Order are hereby being expressly preserved.

3. By this Application, the Committee respectfully requests that, in accordance with this Court’s *Process to Electronically Request that a Document be Sealed* (Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey (uscourts.gov)), the hearing on the Motion to Seal be scheduled on the same date and time as the current return date on the Debtor’s FCR Appointment Motion, which is **May 3, 2023 at 10:00 a.m.**

4. Reduction of the time period requested by this Application is not prohibited under Fed. R. Bankr. P 9006(c)(2).

² As of the submission of this Motion to Seal, the Proposed Protective Order has not been finalized for submission to the Court.

WHEREFORE, the Committee respectfully requests that this Court (i) grant the Application, (ii) enter the form of order substantially in the form submitted herewith, and (iii) grant such other and further relief as it deems necessary and appropriate.

Dated: April 26, 2023

GENOVA BURNS LLC

By: /s/ Gregory S. Kinoian

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